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November 6, 2009

Hon. Magistrate Judge Michael Shipp
United States District Court
U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

RE: Walsh Securities v. Cristo Property Management, et al.
USDC, District of New Jersey
Civil Action No.: 97-3496 (DRD)(MAS)
Moving Party: Vincent P. Manning, Esq. (VPM 7005)
Attorney for Defendant Skowrenski and National Home Funding
Motion Returnable: December 7, 2009

Dear Judge Shipp:

I am writing in response to Mr. Kott's letter of November 2, 2009 (Doc. 362). Mr. Kott suggests that deposing Mr. Skowrenski and his former attorney, Mr. Schottland, is a prerequisite to the court ruling of the Motion to Enforce Settlement (Doc. 359).

I propose the following: the court should enter an Order adjourning the motion sine die and allow the depositions of Mr. Skowrenski, Mr. Schottland, Mr. Kott, Mr. McGowan, and the title company decision makers who authorized the State Court settlements on behalf of Coastal and Commonwealth, limited to the issue "were the settlements intended by the parties to resolve all claim for all times?"

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I see no reason why these depositions could not be accomplished within the next sixty (60) days and the parties supplemental the record and respond to the motion within thirty (30) days thereafter.

Respectfully submitted,



VINCENT P. MANNING

VPM/b